

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**

**DOCKET NO. 2019 -336-T**

Application of Elite Movers, LLC for a Class E (Household Goods) Certificate of Public Convenience and Necessity for Operation of Motor Vehicle Carrier

**MOTION FOR PERMISSION TO  
PRESENT SHIPPER WITNESS  
TESTIMONY BY AFFIDAVIT**

The Commission's regulation concerning the proof required to support an application for a Certificate of Public and Convenience and Necessity for a Class E Mover of Household Goods with Statewide Authority is found in S.C. Code Regs. 103-333. Applicant submits the interests of judicial economy would be served by the Commission allowing it to present the testimony of its "shipper witness" by affidavit subject to the conditions set forth in Application of Midlands Movers, LLC, Order No. 2018-643, Docket No. 2018-268-T, and therefore so moves.

Respectfully submitted,

*s/ Charles L.A. Terreni*

Date: January 9, 2020

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Charles L.A. Terreni  
TERRENI LAW FIRM, LLC  
1508 Lady Street  
Columbia, South Carolina 29201  
Tel. (803) 771-7228  
charles.terreni@terrenilaw.com  
SC Bar. No. 15235

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AFFIDAVIT OF

Being duly deposed and sworn, Affiant states:

1. My name is Damon Blunt and my business address is 5048 Thophton Dr Sumner SC 29485.
2. I am giving this affidavit in support of the application of Elite Movers' application for a Class E Certificate of Public Convenience and Necessity with statewide authority to move household goods to points and places throughout the state of South Carolina.
3. I am employed by Next Move Realty LLC as a real estate agent. I have worked as a real estate agent in the South Carolina area since 2018. Next Move Realty provides real estate services throughout the State of South Carolina.
4. I know the public needs qualified movers to transport household goods within South Carolina because I am often asked to recommend household goods movers by clients or acquaintances moving from one part of the state to another. There is always a need for qualified movers due to South Carolina's robust real estate market, especially if the movers are dependable and experienced. I would like to have another company, such as Elite Movers, LLC to recommend to people looking for moving services.
5. Based on my knowledge of the need for household goods movers in South Carolina, I believe the public interest would be served by granting a Certificate of Public Convenience and Necessity to Elite Movers, LLC.

*Continued on next page*

Further Affiant sayeth not.

Damon Blue  
Affiant

SWORN TO ME THIS 8<sup>th</sup> DAY OF January 2020

Amber Blue  
NOTARY PUBLIC FOR SOUTH CAROLINA  
MY COMMISSION EXPIRES

AMBER BLUE  
Notary Public-State of South Carolina  
My Commission Expires  
March 28, 2028



**BEFORE**  
**THE PUBLIC SERVICE COMMISSION**  
**OF SOUTH CAROLINA**  
**DOCKET NO. 2019-336-T**  
**CERTIFICATE OF SERVICE**

I, **CARL E. BELL**, hereby certify that I have, on this **7th day of January 2020**, served the **MOTION FOR PERMISSION TO PRESENT SHIPPER WITNESS TESTIMONY BY AFFIDAVIT AND AFFIDAVIT OF DAMON BLUNT**, upon the parties listed below by email:

Jenny R. Pittman, Counsel  
[jpittman@ors.sc.gov](mailto:jpittman@ors.sc.gov)  
Office of Regulatory Staff  
1401 Main Street, Suite 900  
Columbia, South Carolina 29201

Jamol Greene, President  
[eliteventures843@gmail.com](mailto:eliteventures843@gmail.com)  
Elite Movers, LLC  
6486 Dorchester Road  
N. Charleston, SC 29418

Christopher Huber, Counsel  
[chuber@ors.sc.gov](mailto:chuber@ors.sc.gov)  
Office of Regulatory Staff  
1401 Main Street, Suite 900  
Columbia, South Carolina 29201

Becky Dover , Counsel  
[bdover@scconsumer.gov](mailto:bdover@scconsumer.gov)  
Carri Grube Lybarker , Counsel  
[clybarker@scconsumer.gov](mailto:clybarker@scconsumer.gov)  
SC Department of Consumer Affairs  
2221 Devine Street, Suite 200  
Columbia, South Carolina 29205

*Carl Bell*

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CARL E. BELL, Paralegal  
Terreni Law Firm, LLC  
1508 Lady Street  
Columbia, South Carolina 29201  
Telephone (803) 771-7228  
Fax (803) 771-8778  
[carlbell@terrenilaw.com](mailto:carlbell@terrenilaw.com)

January 9, 2020  
Columbia, South Carolina